

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: JUL 27 1981

SUBJECT: Permitting Multi-purpose Wells. Ground-Water Program  
Guidance No. 24 (GWPG #24) UIC

FROM: Victor J. Kimm, Deputy Assistant Administrator  
Office of Drinking Water (WH-550)

TO: Water Division Directors Regions I - X  
Water Supply Branch Chiefs  
UIC Representatives

PURPOSE

The litigants have requested clarification of the appropriate procedures for handling wells which may be classified in more than one class during their useful life.

BACKGROUND

Wells used in certain practices, particularly storage of hydrocarbons in salt domes, may fall under various classifications, as defined in section 122.32, during their useful life. For example, a well used to inject fresh water to dissolve parts of a salt dome to form a storage cavern is a Class III well. However, when such a well is used to inject liquid hydrocarbons for storage, it is a Class II well. This cycle may be repeated several times during the life of the well.

GUIDANCE

The procedures for regulating these wells should be streamlined and a single permit covering all phases of the life of a well should be issued.

The permit should specify which classes the well may be operated under, set construction requirements using the requirements of the class with the strictest standards and impose operating, monitoring and reporting requirements that reflect the use of the wells at any given time.

It should be noted that conversion of a well from a Class II or Class III well to a Class I well will be considered a major modification which will require repermitting.

IMPLEMENTATION

Regional offices are instructed to use this guidance in operating UIC programs where EPA has primary enforcement responsibility. They are further instructed to make this guidance available to States working towards primacy and to advise the State Director that these interpretations represent EPA policy.

FILING INSTRUCTIONS

This guidance should be filed as Ground-Water Program Guidance No. 24.

ACTION RESPONSIBILITY

For further information on this guidance contact:

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